

UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE:	:	
	:	:CHAPTER 13
MARK DEVITO	:	
ANN M. DEVITO	:	:BANKRUPTCY NO 24-13433-amc
	:	
Debtors	:	
	:	
PENNSYLVANIA HOUSING FINANCE AGENCY	:	
HOMEOWNERS' EMERGENCY MORTGAGE	:	
ASSISTANCE PROGRAM	:	
	:	
	:	
Movant	:	
	:	
vs.	:	
	:	
MARK DEVITO, ANN DEVITO	:	
AND KENNETH E. WEST Trustee	:	
	:	
	:	
Respondents	:	

**OBJECTIONS OF PENNSYLVANIA HOUSING FINANCE AGENCY HOMEOWNER'S
EMERGENCY ASSISTANCE PROGRAM TO CHAPTER 13 PLAN**

AND NOW comes Pennsylvania Housing Finance Agency Homeowner's Emergency Mortgage Assistance Program(hereinafter "PHFA HEMAP") by its attorneys, Katie M. Housman, and Purcell, Krug & Haller, and objects to Debtors' Chapter 13 Plan as follows:

1. PHFA HEMAP holds the second mortgage against Debtors' property located at 126 S. Forest Road Springfield, PA 19064.
2. PHFA HEMAP filed a Proof of Claim on November 19, 2024, listing its claim as a secured against Debtors' property.
3. Debtors' Chapter 13 Plan fails to provide for payments to pay PHFA HEMAP.
4. Debtors' account is currently 92 months delinquent and is due for April 1, 2017 and arrears of \$9,025.00.
5. Debtors' Plan must provide for payment to PHFA HEMAP on account of its secured claim.

WHEREFORE, PHFA HEMAP objects to confirmation of the Chapter 13 Plan.

PURCELL, KRUG & HALLER

Dated: November 20, 2024

By: /s/Katie M. Housman
Katie M. Housman
1719 North Front Street
Harrisburg, PA 17102-2392
(717)234-4178 ID # 331942
Attorney for Pennsylvania
Housing Finance Agency
khousman@pkh.com

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CERTIFICATE OF SERVICE

I, Katie M. Housman, attorney for Pennsylvania Housing Finance Agency HEMAP, hereby certify that a true and correct copy of the foregoing Objection of Pennsylvania Housing Finance Agency to Chapter 13 Plan was forwarded to the Debtors by regular U. S. Mail, first class service, postage prepaid, on November 20, 2024, addressed as follows:

Mark & Ann Devito
126 S. Forest Road
Springfield, PA 19064

Kenneth E. West, Esquire
Via E-Mail: ECF/CM

Lawrence Rubin, Esquire
via Email: ECF/CM

U.S. Trustee
via email: ECF/CM

Dated: November 20, 2024

By: /s/Katie M. Housman
Katie M. Housman
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Harrisburg, PA 17102-2392
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khousman@pkh.com
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